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| UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY | |
| Caption in Compliance with D.N.J. LBR 9004-2(c) MILSTEAD & ASSOCIATES, LLC By: Andrew M. Lubin Atty. ID: AL0814 1 E. Stow Road Marlton, NJ 08053 (856) 482-1400 File No. 217266 Attorneys for Secured Creditor: Wells Fargo Bank, N.A. | |
| In Re: Fred A. Ordine, Jr. | Case No.: 16-21458-RG Chapter 11 Hearing Date: April 3, 2018 Time: 11:00 am Judge: Rosemary Gambardella |

OBJECTION TO CONFIRMATION OF CHAPTER 11 PLAN

Wells Fargo Bank, N.A. ("Secured Creditor"), by and through its counsel, Andrew M. Lubin, Esquire, of MILSTEAD & ASSOCIATES, LLC, as and for an Objection to Confirmation of debtors' Chapter 11 Plan, states the following grounds therefore:

1. On June 13, 2016, Debtor, Fred A. Ordine, Jr. filed a petition pursuant to Chapter 11 of Title 11 of the United States Code in the United States Bankruptcy Court for the District of New Jersey.
2. Wells Fargo Bank, N.A., is the holder of a first mortgage on real property owned by the Debtor, Fred A. Ordine, Jr. known as and located at 33 Jenkins Road, Hewitt, NJ 07421 (the "Property").
3. Secured Creditor has filed its Proof of Claim in this matter on August 25, 2016 and at claim number 13-1.
4. As set forth in the aforementioned proof of claim, as of the date of the filing of the instant Chapter 11 petition, total arrears due to Secured Creditor through the Plan are \$3,920.61 with a secured claim amount of \$321,535.68.

5. Debtor's Chapter 11 Plan does not provide for a cure of arrears to Secured Creditor within the Chapter 11 Plan.

6. Secured Creditor objects to the Debtor's Chapter 11 Plan as same does not propose to cure the entire pre-petition delinquency due to Secured Creditor and thus the Plan is not feasible as filed.

WHEREFORE, Secured Creditor respectfully requests that the Court deny confirmation of the Chapter 11 Plan for the reasons hereinabove set forth unless modified to provide for payment of pre-petition arrears in full, as set forth above, due to Secured Creditor, and for such other and further relief as to the Court may seem just and proper..

DATED: March 27, 2018

Respectfully submitted,
MILSTEAD & ASSOCIATES, LLC

/s/Andrew M. Lubin
Andrew M. Lubin, Esquire
Attorney ID No. AL0814
1 East Stow Road
Marlton, NJ 08053
(856) 482-1400
Attorneys for Secured Creditor

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-2(c)

MILSTEAD & ASSOCIATES, LLC

By: Andrew M. Lubin Atty. ID: AL0814

1 E. Stow Road

Marlton, NJ 08053

(856) 482-1400

File No. 217266

Attorneys for Secured Creditor: Wells Fargo Bank, N.A.

In Re:

Fred A. Ordine, Jr.

Case No.: 16-21458-RG

Chapter 11

Hearing Date: April 3, 2018

Time: 11:00 am

Judge: Rosemary Gambardella

CERTIFICATION OF SERVICE

1. I, Andrew M. Lubin, Esquire:

☒ represent the Secured Creditor in the above-captioned matter.

☐ am the secretary/paralegal for _____, who represents the
_____ in the above captioned matter.

☐ am the _____ in the above case and am representing myself.

2. On **March 27, 2018**, I sent a copy of the following pleadings and/or documents to the parties listed in the chart below:

Objection of Secured Creditor to Confirmation of Chapter 11 Plan

3. I hereby certify under penalty of perjury that the above documents were sent using the mode of service indicated.

Dated: March 27, 2018

/s/Andrew M. Lubin

| Name and Address of Party Served | Relationship of Party to the Case | Mode of Service |
|--|-----------------------------------|---|
| U.S. Trustee US Dept. of Justice Office of the US Trustee One Newark Center Ste. 2100 Newark, NJ 07102 | Trustee | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |
| Ilissa Churgin Hook Hook & Fatovich, LLC 1044 Route 23 North Suite 204 Wayne, NJ 07470 | Debtor's Attorney | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input checked="" type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |
| Fred A. Ordine, Jr. 33 Jenkins Road Hewitt, NJ 07421 | Debtor | <input type="checkbox"/> Hand-delivered <input checked="" type="checkbox"/> Regular Mail <input type="checkbox"/> Certified mail/RR <input type="checkbox"/> E-mail <input type="checkbox"/> Notice of Electronic Filing (NEF) <input type="checkbox"/> Other _____ (as authorized by the court *) |

* May account for service by fax or other means as authorized by the court through the issuance of an Order Shortening Time.